



REDACTED - FOR PUBLIC INSPECTION
Filed Via Electronic Comment Filing System

July 1, 2019

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Connect America Fund, WC Docket No. 14-58, 47 CFR § 54.313 Annual Reporting Requirements for High-Cost Recipients (Form 481)

Dear Ms. Dortch:

Attached please find San Carlos Apache Telecommunications Utility, Inc.'s (SAC 452169) high-cost support recipient annual report pursuant to 47 CFR § 54.313 (Form 481).

San Carlos is filing certain financial information, reported pursuant to 47 CFR §54.313(f)(2), as confidential under the March 22, 2016 Protective Order (DA 16-296). Pursuant to that Order, each page of this filing that contains confidential information has been marked "REDACTED - FOR PUBLIC INSPECTION." The non-redacted version of this information will be filed under separate cover per the Protective Order's directives. As such, San Carlos will request that the non-redacted version of its submission be withheld from public inspection.

If you have any questions about this filing, please contact the undersigned.

Sincerely,

Dion Nero
Senior Client Manager
(719)531-6342

Attachment

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2018

<010>	Study Area Code	452169
<015>	Study Area Name	SAN CARLOS APACHE
<020>	Program Year	2020
<030>	Contact Name: Person USAC should contact with questions about this data	Shirley Ortiz
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9284752433 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	shirley.ortiz@scatui.com
	Form Type	54.313 and 54.422

<010>	Study Area Code	452169
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[illegible]

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<039>	Contact Email Address - Email Address of person identified in data line <030>	shirley.ortiz@scatui.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	
<410>	Complaints per 1000 customers for fixed voice	
<420>	Complaints per 1000 customers for mobile voice	

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<515>	Certify compliance with applicable minimum service standards	

(600) Functionality in Emergency Situations		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2018

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<039>	Contact Email Address - Email Address of person identified in data line <030>	shirley.ortiz@scatui.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	452169az610.pdf

**(800) Operating Companies
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018

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<039>	Contact Email Address - Email Address of person identified in data line <030>	shirley.ortiz@scatui.com
<810>	Reporting Carrier	San Carlos Apache Telecommunications Utility, Inc.
<811>	Holding Company	San Carlos Apache Telecommunications Utility, Inc.
<812>	Operating Company	San Carlos Apache Telecommunications Utility, Inc.

[illegible]

**(900) Tribal Lands Reporting
Data Collection Form**
**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018**

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<900> Does the filing entity offer tribal land services? (Y/N) Yes

<910> Tribal Land(s) on which ETC Serves

San Carlos Apache Reservation


<920> Tribal Government Engagement Obligation

452169az920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(5) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable
Yes

Yes
Yes
Yes
Yes
Yes
Yes
Yes

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2018

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<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 452169az1010.pdf

Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**
**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
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<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

<1140> Alaska Plan rate-of-return certification (yes, no, or not applicable) of compliance with approved performance plan.

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2018

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452169az1210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP <http://scatui.com/wp-content/uploads/2018/11/ApplicationUniversalForm.pdf>

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- | | | |
|--------|---|-------------------------------------|
| <1221> | Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> | Details on the number of minutes provided as part of the plan, | <input checked="" type="checkbox"/> |
| <1223> | Additional charges for toll calls, and rates for each such plan. | <input checked="" type="checkbox"/> |

(2005) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2018

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Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR 54.313(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

<2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2018.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

(3005) Rate Of Return Carrier Additional Documentation
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018

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(3007) Does this filing retain a Cost Consultant and/or Firm, or other Third Party to prepare financial and operations data disclosures submitted to the National Exchange Carrier Association (NECA), USAC, or the Administrator?

Yes

(3007a)	(3007b)
Name of Consultant	Name of Consultant Firm/Third Party
Dion Nero	Alexicon, Inc.

CAF BLS Reporting

(3008A) Please indicate whether new locations were deployed during the prior calendar year. (Yes/No)

(3008B) Please enter the number of new locations deployed in the prior calendar year associated with each of the following speed tiers.

(3008B1) Number of newly built locations with access to broadband speeds of at least 10/1 Mbps but less than 25/3 Mbps.

(3008B2) Number of newly built locations with access to broadband speeds of 25/3 Mbps or higher.

(3008C) Please provide the percentage of deployment across the entire study area.

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Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
		Yes - Attach Certification	
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}		
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	452169az3010.pdf
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input checked="" type="checkbox"/>	
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	<input checked="" type="checkbox"/>	
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	452169az3017.pdf
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input type="radio"/> <input type="radio"/>
If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input type="checkbox"/>	
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.	<input type="checkbox"/>	
If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input type="checkbox"/>	
(3023)	Underlying information subjected to a review by an independent certified public accountant	<input type="checkbox"/>	
(3024)	Underlying information subjected to an officer certification.	<input type="checkbox"/>	
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	

(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

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Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

REDACTED FOR PUBLIC INSPECTION

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4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations and provide a list of newly served community anchor institutions.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas.

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information
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(5005) Alaska Plan Participants Additional Documentation Data Collection Form	FCC Form 481
	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2018

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5005 Alaska Plan

(5010) Do you participate in the Alaska plan? (Yes/No)

(5011)	Please indicate whether any terrestrial backhaul or other satellite backhaul became commercially available in the previous calendar year in areas previously served exclusively by performance-limiting satellite backhaul.	(Yes/No)
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(5012)	<p>If the filing carrier identified in its approved performance plans that it relies exclusively on satellite backhaul for a certain portion of the population in its service area, indicate whether any terrestrial backhaul or other satellite backhaul became commercially available in the previous calendar year in areas that were previously served exclusively by satellite backhaul.</p>	(Yes/No)
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[illegible]

**Certification - Reporting Carrier
Data Collection Form**
**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018**

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TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2018
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<039> Contact Email Address - Email Address of person identified in data line <030>	shirley.ortiz@scatui.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Alexicon, Inc.</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	<u>Alexicon, Inc.</u>
Name of Reporting Carrier:	<u>SAN CARLOS APACHE</u>
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	<u>Shirley Ortiz</u>
Title or position of Authorized Officer:	<u>CEO/General Manager</u>
Telephone number of Authorized Officer:	<u>9284757058 ext.</u>
Study Area Code of Reporting Carrier:	<u>452169</u> Filing Due Date for this form: <u>07/01/2019</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	<u>SAN CARLOS APACHE</u>
Name of Authorized Agent Firm:	<u>Alexicon, Inc.</u>
Signature of Authorized Agent or Employee of Agent:	Date: <u>06/27/2019</u>
Name of Authorized Agent Employee:	<u>Dion Nero</u>
Title or position of Authorized Agent or Employee of Agent	<u>Sr. Client Manager</u>
Telephone number of Authorized Agent or Employee of Agent:	<u>9183769901 ext.</u>
Study Area Code of Reporting Carrier:	<u>452169</u> Filing Due Date for this form: <u>07/01/2019</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

San Carlos Apache Telecommunications Utility, Inc. (SAC 452169)

Statement Regarding Functionality in Emergency Situations

47 C.F.R. § 54.313(a)(10)

Form 481, Line 610

San Carlos Apache Telecommunications Utility, Inc. (“the Company”) is able to function in emergency situations for both voice and broadband service. The Company has a reasonable amount of back-up power to ensure functionality without an external power source. Standby power generators are supplied at the central office, remote switch sites, and repeater sites to ensure functionality without an external power source until power is restored, so long as fuel is available. The network is capable of managing traffic spikes resulting from emergency situations.

The Company is able to reroute traffic around damaged facilities. Although the Company’s ability to reroute traffic around damaged facilities is not absolute and may be limited in certain circumstances, there is a restoration plan in place for expeditious recovery of service, including splicing of damaged facilities when warranted.

The Company has three Sonet fiber rings that increase the survivability of its network. The rings allow the Company to maintain service to its remote electronic sites in the event of a fiber outage, making the Company’s network efficient, economical, and reliable.



LINE 920 – TRIBAL GOVERNMENT ENGAGEMENT OBLIGATION

San Carlos Apache Telecommunications Utility, Inc. (“SCATUI” or “the Company”) is a tribally owned company and as such, engagement with the San Carlos Apache Tribe (“SCAT” or “the Tribe”) and the Tribal Council are essential to the Company’s operation. SCATUI’s General Manager along with the President or other member of its Board of Directors meet with the San Carlos Apache Tribal Council and other SCAT representatives on a quarterly basis. During those meetings, the Company provides progress reports on its various communications and broadband plans, and engages in conversations regarding any modifications needed to meet the needs of the Tribe. Presently, four members of the Tribal Council sit on SCATUI’s Board of Directors, with each member representing one of the four districts of the reservation.

SCATUI’s General Manager and management team also participate in SCAT’s annual Special Council meeting. During the annual meeting, SCATUI presents its year-end accomplishments, financial information, and future goals and projects for the coming year.

Needs Assessment and Deployment Planning with a Focus on Tribal Community Anchor Institutions

Since SCATUI’s inception, discussions between the Company and the Tribe regarding needs assessment and deployment planning have been integral to the growth in its customer base on the reservation from approximately 600 in 1998 to over 2,500 in 2019. Ongoing discussions and planning result in the deployment of new services to existing customers as well as the extension of telecommunications and broadband services to new anchor institutions and housing developments on the reservation.

In addition, funding from the American Recovery and Reinvestment Act has made fiber-to-the-home deployment possible in a new housing development and will also fund fiber build out to other housing communities presently served via copper.

Feasibility and Sustainability Planning

At least every five years the Tribe develops a comprehensive economic development strategy and SCATUI is an active participant in the planning process.

Marketing in a Culturally Sensitive Manner

Marketing is done in a culturally sensitive manner. SCATUI participates in community meetings where it presents information on its services to the public, including its Lifeline program offerings. The presentations are provided in the Apache language for those residents who only speak Apache. Other services have been customized to meet the needs of the public such as voice mail verbal instructions offered in the Apache language. Many of the Company’s employees are members of the SCAT, understand the

community's needs, and are sensitive to the cultural differences of its customers. SCATUI collaborates with the Tribal Language Preservation program by placing "Apache Word of the Week" ads on its local advertising channel. Local businesses also offer auto-attendant call recordings in the Apache language for Apache speaking customers.

Compliance with Rights of Way Processes, Land Use Permitting Requirements, Facilities Sitting Rules, Environmental Review Processes, and Cultural Preservation Review Processes

During the quarterly meetings and ongoing as necessary, SCATUI engages with the Tribal Council and respective Tribal departments regarding right-of-way processes, land use permitting requirements, facilities sitting rules, environmental review processes, and cultural preservation review processes specific to each of the Company's projects.

Compliance with Tribal Business and Licensing Requirements

SCATUI complies with all Tribal business and licensing requirements. The Company is required to obtain a Tribal Privilege License. It must also apply annually for a Tribal Business License as well as a Land Lease agreement.

San Carlos Apache Telecommunications Utility, Inc. (SAC 452169)

Statement Regarding Voice Rate Comparability

47 C.F.R. § 54.313(a)(10)

Form 481, Line 1010

The Wireline Competition Bureau's most recent reasonable comparability benchmark for voice services is \$51.61, which includes the federal subscriber line charge ("SLC").¹

In all of the exchanges served by San Carlos Apache Telecommunications Utility, Inc. ("the Company"), the single-line residential local rate is \$18.00. When the federal SLC (\$6.50) is included, the rate becomes \$24.50. Therefore, the Company's pricing of fixed voice services is less than the reasonable comparability benchmark of \$51.61.

¹ *Wireline Competition Bureau Announces Results of Urban Rate Survey for Voice Services; Seeks Comment on Petition for Extension of Time to Comply With New Rate Floor*, WC Docket No. 10-90, DA 14-384 (rel. Mar. 20, 2014), p. 2.

San Carlos Apache Telecommunications Utility, Inc. (SAC 452169)

Statement Regarding Terms & Conditions of Voice Telephony Lifeline Plans

47 C.F.R. § 54.313(a)(10)

Form 481, Line 1210

All of the exchanges served by San Carlos Apache Telecommunications Utility, Inc. (“the Company”) are Tribal lands. In all of the Company’s exchanges, residential customers who qualify for the Lifeline Program receive a discount of \$24.50 on local voice telephony service.

In all of the Company’s exchanges, the Lifeline single-line residential rate, including the federal SLC, is \$0.00 (\$24.50 standard rate - \$24.50 discount).

All single-line residential customers, including Lifeline customers, have an unlimited number of minutes for calls made within their local calling area.

Toll charges for calls outside of the local calling area are determined by the long distance carrier of the customer’s choosing. Lifeline customers may elect to subscribe to toll blocking at no charge.

The Company does not disconnect the service of Lifeline subscribers for the non-payment of toll charges. However, the Company reserves the right to implement toll blocking, at no charge, if the customer incurs a significant balance of unpaid toll bills.

The Company offers bundled services to Lifeline customers that are discounted by \$24.50 for the voice component of the bundle.

Lifeline Program reductions do not apply to additional services such as custom calling features. Lifeline customers may subscribe to these services at the same rates offered to other customers.

Additional information regarding the terms and conditions of voice telephony Lifeline plans can be found at <http://scatui.com/telephone/e-lifelinee-linkup/>.

San Carlos Apache Telecommunications Utility, Inc. (SAC 452169)

Progress Report on 5 Year Plan – Milestone Certification

47 C.F.R. § 54.313(f)(1)(i)

Form 481, Line 3010

San Carlos Apache hereby certifies pursuant to 47 CFR 54.313(f)(1)(i) that it is taking all reasonable steps to provide, upon reasonable request, broadband service at actual speeds of at least 10 mbps downstream and 1 mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, and that requests for such service are met within a reasonable time frame.

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